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Attorney for Plaintiff Jason Jorjani

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JASON JORJANI

Plaintiff,

v.

NEW JERSEY INSITUTE OF TECHNOLOGY,
et al.

Defendants.

Civil Action No. 2:18-cv-11693

**NOTICE OF MOTION
TO RESTORE PRIOR MOTION
& TO UNSEAL**

MOTION RETURN DATE:
APRIL 19, 2021

PLEASE TAKE NOTICE that on April 19, 2021, or as soon as the Court deems appropriate, counsel for Plaintiff Jason Jorjani shall move pursuant to Local Civil Rule 5.3(c) before this Honorable Court, at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for the entry of an Order:

- A. Restoring Plaintiff's Cross Motion to Unseal the Complaint at DKT. 18 of the Companion Case of Jorjani v. Deek, et al., Civil Action No. 2:20-cv-1422;
- B. Unsealing both the Complaint in the Companion Case (DKT. 4 therein) and Exhibit 1 to said Cross Motion in the Companion Case (DKT. 19 therein);

- C. Unsealing the materials in Plaintiff's Objection at DKT. 62 herein (with the limited exception of the materials which Plaintiff consents to keep sealed, as indicated in the attached Exhibit A, Index in Support and In Opposition to Motion to Seal); and
- D. For such other, further and different relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Plaintiff will rely upon the Affidavit of Frederick C. Kelly sworn March 22, 2021, with Exhibits attached thereto.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that counsel for Defendants object to the relief in this motion

Dated: March 22, 2021

Joseph J. Haspel, PLLC

/s/ Joseph J. Haspel

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